

1
2
3 Patrick McMahon, WSBA #18809
4 Attorney for Defendants
Carlson & McMahon, PLLC
37 South Wenatchee Avenue, Suite F
5 P.O. Box 2965
Wenatchee, WA 98807-2965
6 509-662-6131
509-663-0679 Facsimile
7 patm@carlson-mcmahon.org

8 THE HONORABLE ROSANNA MALOUF PETERSON
NOVEMBER 4, 2018, 6:30 P.M.
9 WITHOUT ORAL ARGUMENT

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF WASHINGTON
12

13 JOSHUA BRENT STULLER,
14 individually and on behalf of all others
15 similarly situated,

16 Plaintiff,

17 VS.

18 CHELAN COUNTY, WASHINGTON;
19 BILL LARSEN, in his official capacity as
20 Interim Director of the Chelan County
Regional Justice Center; LESLIE
21 CARLSON, in her official capacity as the
Chelan County Regional Justice Center
22 Mental Health Manager, and their officers,
agents, employees, and successors,
23
24

25 Defendants.
26
27
28
29
30

NO. 2:18-cv-00178-RMP

DEFENDANTS' MOTION TO SEAL

1
2 COMES NOW, Defendants, by and through their attorney of record,
3
4 PATRICK MCMAHON of CARLSON & MCMAHON, PLLC, and hereby moves
5 this Court for an Order Sealing Exhibit No. 3 (ECF No. 14) to the Declaration of
6
7 Patrick McMahon (ECF No. 16).

8 Exhibit No. 3 is a confidential medical record and it is necessary to respond
9 to the Court's inquiry regarding the appointment of a Guardian ad Litem for the
10 Plaintiff. As such, this Court should seal this Exhibit as it is not appropriate for a
11
12 public dissemination.

13
14
15 RESPECTFULLY SUBMITTED THIS 4TH day of OCTOBER, 2018.
16

17 CARLSON & McMAHON, PLLC

18 By /s/ Patrick McMahon
19 PATRICK MCMAHON, WSBA #18809
20 Attorney for Defendants

21
22 37 South Wenatchee Avenue, Suite F
23 P.O. Box 2965
24 Wenatchee, WA 98807-2965
25 509-662-6131
509-663-0679 Facsimile
patm@carlson-mcmahon.org

26
27
28 WCRP05-02450\PLE Federal\MOTION TO SEAL-100418

29
30 DEFENDANTS' MOTION TO SEAL
Page 2

Carlson & McMahon, PLLC
37 South Wenatchee Ave. 3rd Floor, Ste. F
Post Office Box 2965
Wenatchee, WA 98807-2965
(509) 662-6131 Fax (509) 663-0679

CERTIFICATION OF SERVICE

I declare under penalty of perjury under the laws of the State of Washington that on October 4, 2018, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Washington using the CM/ECF system which will send notification of such filing to:

Andrew S. Biviano abiviano@pt-law.com

Breean L. Beggs bbeggs@pt-law.com

Mary Elizabeth Dillon bdillon@pt-law.com

And I certify that I have mailed by United States Postal Service the foregoing to the following non CM/ECF participants:

Signed at Wenatchee, Washington on OCTOBER 4, 2018.

/s/ Patrick McMahon
PATRICK MCMAHON, WSBA #18809